

Description of Violations
Mid-City Plating Company, Incorporated
U.S. EPA ID Number: IND006049456
Record Review of July 14, 1997

1. Page 13

40 CFR 268.7(a)(7)

The generator failed to retain on-site copies of all notices, certifications, waste analysis data, and other documentation produced pursuant to 40 CFR 268.7 for at least five (5) years. Specifically, the generator was missing the Land Disposal Restriction notifications for hazardous waste manifests IL6464767 and IL7090963.

Copies of the missing Land Disposal Restriction notifications were obtained from the TSD by the generator and submitted via facsimile to the department on April 17, 1997.

2. Page 15
Page 16

40 CFR 265.16(d)

At the time of the inspection, the information required in the personnel training records was missing and the following violations were noted:

- The personnel training records did not include the job titles for the positions related to hazardous waste management.
- The personnel training records did not include the name of the employees filling each job title.
- The personnel training records did not include the job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position.
- The personnel training records did not include the description of both introductory and continuing training required for each job.

At the time of the inspection, no training records for Marcia Muzzarelli, Alternate Environmental Coordinator, were available.

At the time of the inspection, the facility representative stated that no employees had received an annual review of training within the prior twelve months.

Action

The generator shall provide the required training to the personnel managing the hazardous waste on-site. This would include, but not be limited to, the production personnel handling hazardous waste, the waste treatment operator(s) managing the waste, and the personnel responsible for manifesting the hazardous waste offsite. Additionally, the aforementioned documentation must be available and on-site.

**The aforementioned missing information was supplied by the facility.
Additionally, Ms. Marcia Muzzarelli is no longer the Alternate
Environmental Coordinator.**

3. Page 17 40 CFR 265.52(e)
The generator failed to include a list of all emergency equipment at the facility in the site specific contingency plan. The list should include the location of each piece of equipment, a physical description of each item on the list and a brief description of its capabilities.

Action

The generator shall update and distribute the site specific contingency plan. The updated plan should be distributed to the local emergency agency, the state, the local fire and police departments and the local hospital.

The aforementioned missing information was supplied by the facility.

4. Page 17 40 CFR 265.52(f)
The generator failed to include an evacuation plan for facility personnel in the site specific contingency plan. The plan must describe the signal(s) to be used to begin the evacuation, the evacuation routes and alternate evacuation routes.

Action

The generator shall update and distribute the site specific contingency plan. The updated plan should be distributed to the local emergency agency, the state, the local fire and police departments and the local hospital.

The aforementioned missing information was supplied by the facility.

5. Page 7 IC 13-30-2-1
During the inspection, hazardous waste was observed on the floor behind the Jessup Plating Line. The facility representatives stated that the waste was an F008 waste generated by an outside contractor that had recently worked on the cooling coil equipment. The spilled hazardous waste was cleaned-up and properly containerized before the end of the inspection

6. Page 7 Note of Concern:
During the inspection, the floor drains in the Drum Rinse Area that lead to

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Mid-City Plating Company, Inc.
Page 3

the waste treatment area of the facility were clogged to a point where the flow was limited if not obstructed. At the time of the inspection, no waste was overflowing, but if a spill was to occur, the drain would not operate as required or designed.

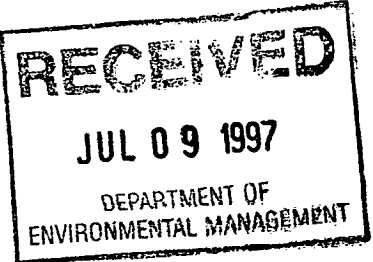
According to the facility response, the drainage system was cleaned and is no longer obstructed.

Mid City Plating Co., Inc.

921 East Charles Street

Muncie, IN 47305

Tel. (765) 289-2374 Fax (765) 289-2520



July 7, 1997

Mr. John Naddy
IDEM
100 North Senate Avenue
Indianapolis, IN 46206-6015

Re: Response to Notice of Violation
Mid City Plating Co., Inc., USEPA ID Number: IND 006049456

Dear Mr. Naddy:

Thank you for the courtesies extended to me during your plant visit to our facility on April 16, 1997. All the items discussed during the inspection have been addressed and are summarized with the action taken as follows:

1. 40 CFR 268.7 (a)(7). Copies of missing Land Disposal Restriction notifications were submitted to the department on April 17, 1997 via facsimile.
2. CFR 265.16(d). The personnel records include the job descriptions for the positions relating to hazardous waste attached hereto as **Hazardous Waste Management Procedures**. The records include the name and qualifications of each employee filling each job related to hazardous waste. The records indicate the introductory and continuing training required for the identified jobs. Annual training on site has been scheduled for July 12, 1997 by Certified Environmental Trainer, Mr. Thomas H. Martin, Delta Compliance Consultants, Indianapolis based company. Training records will be kept on site and readily available for inspection.
3. 40 CFR 265.52 (e). A list of emergency equipment at the facility was located in the existing **Contingency Plan and Emergency Procedures for Hazardous Waste** previously submitted to IDEM on April 24, 1994 and attached hereto under section VI. List of Emergency Equipment for Hazardous Waste Purposes. The plan has been revised to include the new street address change as of 7/7/97 and will be distributed to the Local Emergency Planning Commission, IDEM, Muncie Fire Department, Muncie Police Department and Ball Memorial Hospital.
4. 40 CFR 265.52 (f). The evacuation plan was located in the existing **Contingency Plan and Emergency Procedures for Hazardous Waste** under section VIII. Evacuation Plan. It has also been revised to include the new street address along with revisions to the evacuation map.
5. IC 13030-2-1. The dry crusty material observed on the floor behind the Jessup Plating line was the result of calcium carbonate crystal formation on the cooling coils and was technically not the suspected F-008 as suggested at the time of inspection. However, the debris was containerized and shipped to Cyanokem for disposal.
6. Note of Concern. The floor drains in the drum rinse area that lead to wastewater treatment have been cleaned and are not obstructed. No overflow situation was encountered.

If you have any questions concerning our compliance with the above items, please feel free to call.

Sincerely,

A handwritten signature in dark ink, appearing to be "Rodney Muzzarelli", written over a horizontal line.

Rodney Muzzarelli
Plant Manager

**Contingency Plan and
Emergency Procedures
for Hazardous Materials and Waste**

(RCRA 40 CFR 265 Subpart D)

**Employee Emergency Action Plan and
Fire Prevention Plan**

(OSHA 29 CFR 1910.38)

Mid City Plating Co., Inc.

921 East Charles Street

Muncie, IN 47305

(765) 289-2374

Plan Date: October 20, 1993

Revised: April 21, 1994

Revised: July 7, 1997

Contents

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- IX. Required Reports

I. General Information

Company Name: Mid City Plating Co., Inc.
Mailing Address: P. O. Box 6
Muncie, IN 47308

Plant Location: 921 East Charles Street
Muncie, IN 47305

Emergency Coordinators:

1. Rodney Muzzarelli - Owner
2. Marc Muzzarelli - Production Manager

Type of Facility: This facility is a one story building used for electroplating of metal parts.

Facility Site Plan: See attached site plan.

Description of Activities: The hazardous waste generated from electroplating wastewater treatment sludges is contained in a 20 cu.yd. covered rolloff container located at the North side of the building.

II. Overview

The purpose of this document is to minimize hazards to human health or the environment from fires, explosions, or any unplanned releases of hazardous materials or hazardous substances to air, soil, or surface water. The provisions of this document will be carried out immediately whenever there is a fire, explosion, or release of hazardous materials or hazardous substances which could threaten human health or the environment.

A copy of this document and all revisions will be maintained at the facility and submitted to all local fire department and state and local emergency response teams that may be called upon to provide emergency services.

This document will be reviewed, and immediately amended, if necessary whenever;

1. Applicable regulations are revised;
2. The plan fails in an emergency;
3. The facility changes-in its design, construction, operation, maintenance, or other circumstances-in a way that materially increases the potential for fires, explosions, or releases of hazardous materials or hazardous substances, or changes the response necessary in an emergency;
4. The list of emergency coordinators changes; or
5. The list of emergency equipment changes.

III. Emergency Coordinators

There shall be an Emergency Coordinator on the premises or on call at all times. The Coordinator(s) shall be responsible for coordinating all emergency response measures and have the authority to commit resources (incur debts) to carry out the Contingency Plan.

Persons listed as Emergency Coordinators are familiar with and knowledgeable about;

1. all aspects of the Contingency Plan;
2. all operations and activities at the facility;
3. the location and characteristics of waste handled;
4. the location of all records within the facility; and
5. the facility layout.

Primary Emergency Coordinator

Rodney Muzzarelli, Owner
12751 S. County Rd. 400 W.
Daleville, IN 47334
(765) 284-3962 Home
(765) 289-2374 Work

First Alternate Emergency Coordinator

Marc Muzzarelli, Production Manager
5300 S. Burlington
Muncie, IN 47302
(765) 282-9748 Home
(765) 289-2374 Work

IV. Implementation of Contingency Plan

This Contingency Plan must be implemented if an imminent or actual incident could threaten human health or the environment.

The following are the Contingency Plan implementation criteria for the three types of incidents of concern:

Spills

- A. The spill could result in release of flammable liquids or vapors, creating a fire or explosion hazard.
- B. The spill could cause the release of toxic liquids or gases.
- C. The spill cannot be contained on-site.

Fires

- A. The fire could cause the release of toxic fumes.
- B. If the fire spreads, it could ignite materials at other locations on-site.
- C. The fire could spread to off-site areas.

Explosions

- A. An imminent danger exists that an explosion could occur.
- B. An explosion has occurred.

V. Emergency Response Procedure

Once the decision is made to implement the Contingency Plan, the Emergency Coordinator must take a series of actions: 1) immediately upon discovery of an emergency, 2) during the emergency control phase, and 3) immediately following attainment of control. The following are the specified procedures:

A. Immediately upon discovery of an imminent or actual emergency situation

1. Activate the internal alarms or communications system to notify facility personnel.
 - a. Account for all personnel.
 - b. Determine if there are any injuries.
2. Notify local, state, and federal agencies.
 - a. Local
Muncie Fire Department 911
Muncie POTW 765-747-4896

Delaware Co. Local Emergency Planning Commission
Marshall Sipe, Chairman
300 North High Street
Muncie, IN 47305-1639
(765) 747-4888 (24 hrs.)
 - b. State
IDEM (317) 233-7745
IDEM General Information
1 (800) 451-6027
 - c. Federal

U.S. Coast Guard National Response Center
(800) 424-8802 or (202) 426-2675
EPA Region V (312) 886-7449
3. Identify the character, exact source, amount and extent of any released materials.
 - a. Determine if facility evacuation is necessary.
 - b. Determine if facility personnel can control the situation.

- c. Notify one of the listed commercial emergency response vendors if facility personnel and local public safety personnel cannot control the situation.
4. Assess hazards to the environment and human health.
5. Determine if evacuation of the local area is advisable. If so, notify local authorities.
6. Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility.

Internal Emergency Phone Numbers

Rodney Muzzarelli - 765-289-2374

Commercial Emergency Response Vendors

Spill Recovery of Indiana
Indianapolis, IN 46234
(317) 291-3972

Additional Information Sources

CHEMTREC
(800) 424-9300

Indiana Poison Center
(800) 382-9097

B. Emergency Control Phase Measures

Drum Storage Spill

1. Determine the source of spill and material(s) involved.
2. Determine the hazard(s) involved.
3. Responding personnel are to be properly equipped with safety equipment, clothing, and respiratory protection.
4. Responding personnel are to approach the leaking drum or spilled material from an up wind direction, if possible.
5. Contain the spill to the smallest area possible.
6. Upright any overturned drums or overpack leaking containers.
7. If the spilled material is unrecoverable, treat or absorb the material.
8. Remove spilled and sorbent materials and contaminated soils.
9. Clean, restore, or replace spill response equipment and return it to

original location(s).

Drums or Tank Storage Area Fire or Explosion

1. Determine what is on fire.
2. Determine the hazard(s) involved.
3. Evacuate all endangered or unnecessary personnel.
4. Determine if evacuation of off-site areas is necessary.
5. Small (single barrel) fires may be responded to by on-site personnel while the fire department is in route. Water hoses, fire extinguishers, dirt or sand may be utilized. Any such response may be taken only if it will not endanger the responder's life or health. Appropriate safety equipment must be worn.
6. Allow the fire department to take appropriate and necessary measures.
7. After the fire is extinguished, clean up affected areas.
8. Clean, restore, or replace emergency equipment and return it to original location(s).

C. Response Measures for Oxidizer Incidents

The following oxidizers are present at the facility:

Nitric Acid, Chromic Acid, and Sodium Hypochlorite

Small Spills are considered to be less than 55 gallons

Isolate persons in all directions 500 feet

Protect persons downwind 0.1 miles during the day and 1.2 miles at night

Large Spills are considered to be any amount over 55 gallons

Isolate persons in all directions 500 feet

Protect persons downwind 0.2 miles during the day and 1.6 miles at night

Fire or Explosion

Oxidizers may ignite with other combustible materials (wood, paper, oil, etc.). These materials will accelerate burning when they are involved in a fire; some may react violently with fuels. Flammable poisonous gases may accumulate in tanks. Runoff to sewer may create fire or explosion hazard.

Health Hazard

If inhaled, may be harmful. Contact may cause burns to skin or eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

Emergency Action

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind, keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

Fire

Small Fires: Water only; no dry chemical, CO₂ or Halon.

Large Fires: Flood area with water. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. NEVER SPRAY WATER INTO CONTAINER. For massive fire withdraw from area and let fire burn.

Spill or Leak

Keep combustibles (wood, paper, oil, etc.) away from spilled material. Do not touch or walk through spilled material; stop leak if you can do it without risk.

Use water spray to reduce vapor; do not get water inside container.

Small Dry Spills: With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.

Small Spills: Flush area with flooding amounts of water.

Large Spills: Dike far ahead of liquid spill for later disposal.

D. Follow-up Activities

1. Provide for treating, storing or disposing of recovered waste, contaminated soil, surface water or other material resulting from the incident.
2. Ensure that clean-up procedures are completed and emergency equipment is fit for use before resuming operations in the affected areas.
3. Notify Local, State and Federal officials before resuming operations.
4. Submit written report on the incident to the Indiana Department of Environmental Management and the U.S. Environmental Protection Agency.

VI. List of Emergency Equipment for Hazardous Waste Purposes

Hazardous wastes generated by Mid City Plating Co., Inc., are temporarily accumulated in the North End loading dock area. The purpose of this list is to inventory all emergency equipment that may be used in an emergency situation involving Mid City's hazardous wastes. This list includes, for each item:

- a. location;
- b. physical description; and
- c. brief outline of capabilities

Fire Extinguishers

There are numerous hand-held dry chemical fire extinguishers in the plant near the hazardous waste accumulation area. Extinguishers have a 4 A-60 B C rated capacity. These extinguishers are effective on combustible material (A), flammable liquid (B), and electrical (C) fires. If a fire could not be extinguished with these units, the Fire Department would be called immediately, and the Contingency Plan put into effect. There is also a fire extinguisher located in the employee break room.

Alarm

A voice paging alarm is in operation at Mid City. Telephones are located in the laboratory and office areas. In the event of the need for evacuation an announcement would be made. In addition the facility is protected by an ADT automatic dispatch alarm. In the event of a fire, the dispatch and police would be called automatically.

Communication System

A telephone is located in the main office and also in the laboratory. These phones can be used to access the plant intercom system, or to make internal or external phone calls.

Neutralization Agent

A fiber drum (200 lb capacity) will be kept full of a powdered alkali - specifically soda ash. Soda ash effectively neutralizes and solidifies spills of wastewater treatment sludges and any free liquids from the treatment process. The drum will be kept in the southwest corner of the wastewater treatment facility.

Absorbents

A fiber drum (100 lb. capacity) will be kept full of granular calcined clay absorbent (Oil-Dry, Zorb-All, Maltan, or similar brand names). These absorbents are effective on most liquid

spills. The drum will be kept in the southwest corner of the wastewater treatment facility. A pallet with at least 8 - 50 lb. bags of absorbents will be maintained as a supplement to the fiber drum.

Eyewash/Shower Facilities

An emergency deluge shower with eyewash capabilities is located just east of the wastewater treatment facility. This unit is capable of decontaminating personnel exposed to hazardous wastes or hazardous material residues, by flushing such residues for extended periods of time with copious volumes of water.

Empty Drums

At least two empty DOT 17-H open head drums will be kept at the North end loading dock. These drums are 55 gallons in capacity, and can be used to contain spilled materials, or to contain materials transferred from leaking containers.

Personal Protective Equipment

Employees involved in handling hazardous waste or electroplating solutions are issued chemical resistant boots, gloves, aprons, and face shields for their personal use. These items are normally located in the storage lockers near the front office when not in use.

Cyanide Antidote Kit

Cyanide antidote kits are kept at the facility and readily available in the event of cyanide poisoning. The kits contain ampules which can be broken and held to the nose. The kit also contains an intravenous injection solution and delivery device which must be administered by a doctor, nurse, or paramedic. When administered within 2 minutes of overexposure, the antidote has a high rate of success.

VII. Coordination Agreement

Mid City Plating Co., Inc., has attempted to make arrangements with the Muncie Police and Fire Department, and Ball Memorial Hospital and the Delaware County Local Emergency Planning Commission for hazardous materials/waste emergencies. Copies of the Mid City Plating Co., Inc., Contingency Plan and Emergency Procedures document have been transmitted to these agencies by Certified Return Receipt Mail.

An agreement has been obtained in this regard and is described as follows. The Ball Memorial Hospital has agreed to provide emergency services for minor or serious injuries. The hospital is a full service facility providing both emergency, surgery and recovery care.

VIII. Evacuation Plan

In the event the evacuation of the facility is deemed necessary, the following procedure should be followed:

- a. sound the evacuation alarm or make the announcement over the paging system;
- b. follow the evacuation route marked on the attached Evacuation Plan Map;
- c. all employees are to assemble at the Evacuation Assembly Area located at the front entrance on Hackley Street;
- d. supervisors are to pull time cards if possible;
- e. all employees are to be accounted for;
- f. the Emergency Coordinator is to be notified of any missing employees.

IX. Required Reports

Follow-up reporting in writing.

- All oral reports of a reportable quantity (RQ) spill to the sanitary sewer must be followed up by a written report within five (5) days to the POTW.

POTW Information

Bureau of Water Quality
Mr. John Craddock

Muncie, IN
(765) 747-4896

- All oral reports to IDEM of water threat or spill must be followed by written report within ten (10) days to IDEM.

IDEM Information

Indiana Department of Environmental Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, IN 46206-6015

Damage Assessment

- As a result of a spill, the Department of Natural Resources (DNR) may require a damage assessment to be performed.

Natural Resources Damage Assessment Information

Indiana Department of Natural Resources
Division of Fish and Wildlife
402 W. Washington Street
Room W273
Indianapolis, IN 46204

Dr. Wayne Faatz 232-4080

Content of Report in Writing

Date of incident
What substance was released, CAS #
Amount of release
Where was release to: air, soil, water, sewer
Effect of the release
Agencies notified
Cause of release
Corrective actions taken
Plan to prevent reoccurrence

Chemical Release Reporting (TRI)

Under Title III of the Superfund Amendments and Reauthorization Act, the submission of U.S. EPA Form R, the Toxic Chemical Release Inventory (TRI) is required. Facilities are required to report quantities of routine and accidental releases into the environment of certain listed toxic chemicals. 40 CFR Part 372

Submit Form R Reports to:

State Emergency Response Commission (SERC)
Indiana Department of Environmental Management
Ken Rogers
100 N. Senate Avenue
P. O. Box 7024
Indianapolis, IN 47207-7024

U.S. EPA
EPCRA Reporting Center
P. O. Box 3348
Merrifield, VA 22116-3348
Attn: TRI

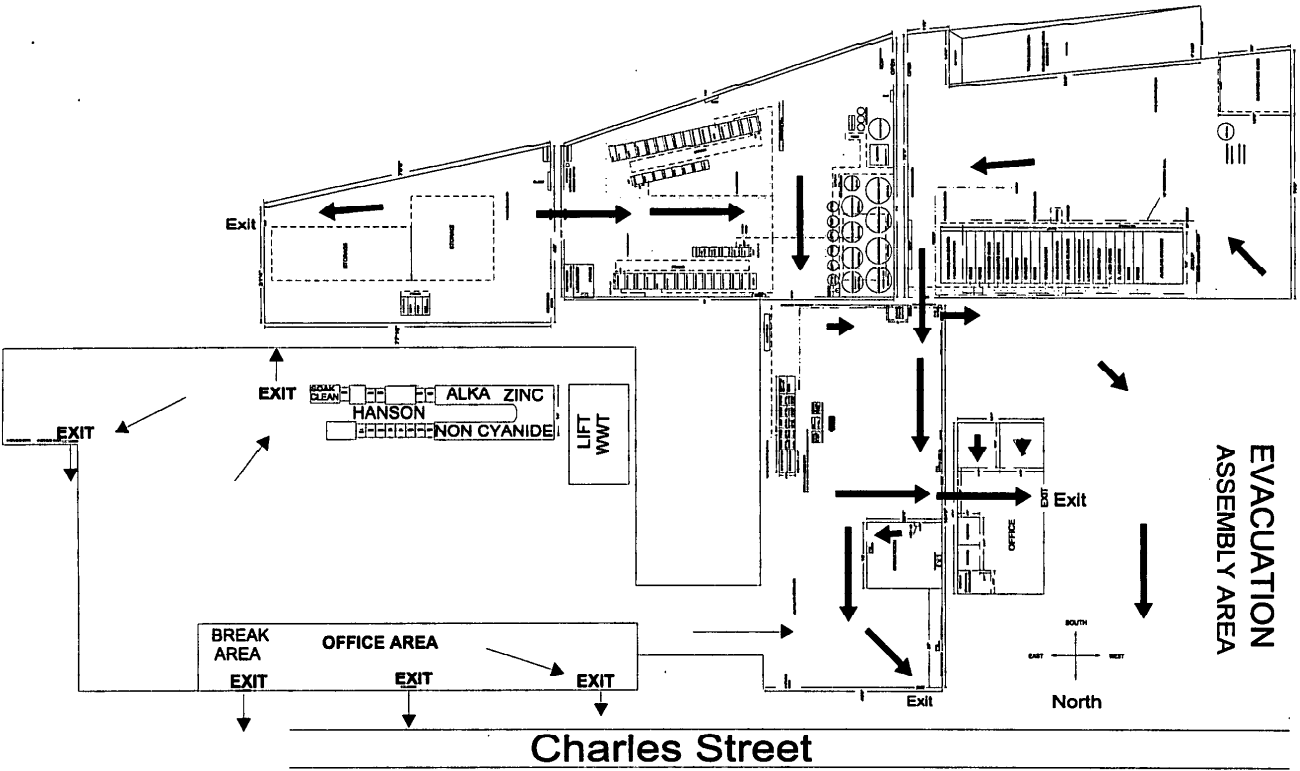
If sending the report certified mail, send to:

U.S. EPA
EPCRA Reporting Center
4301 N. Fairfax Drive, 6th Floor, Suite 650
Arlington, VA 22203
Attn: TRI

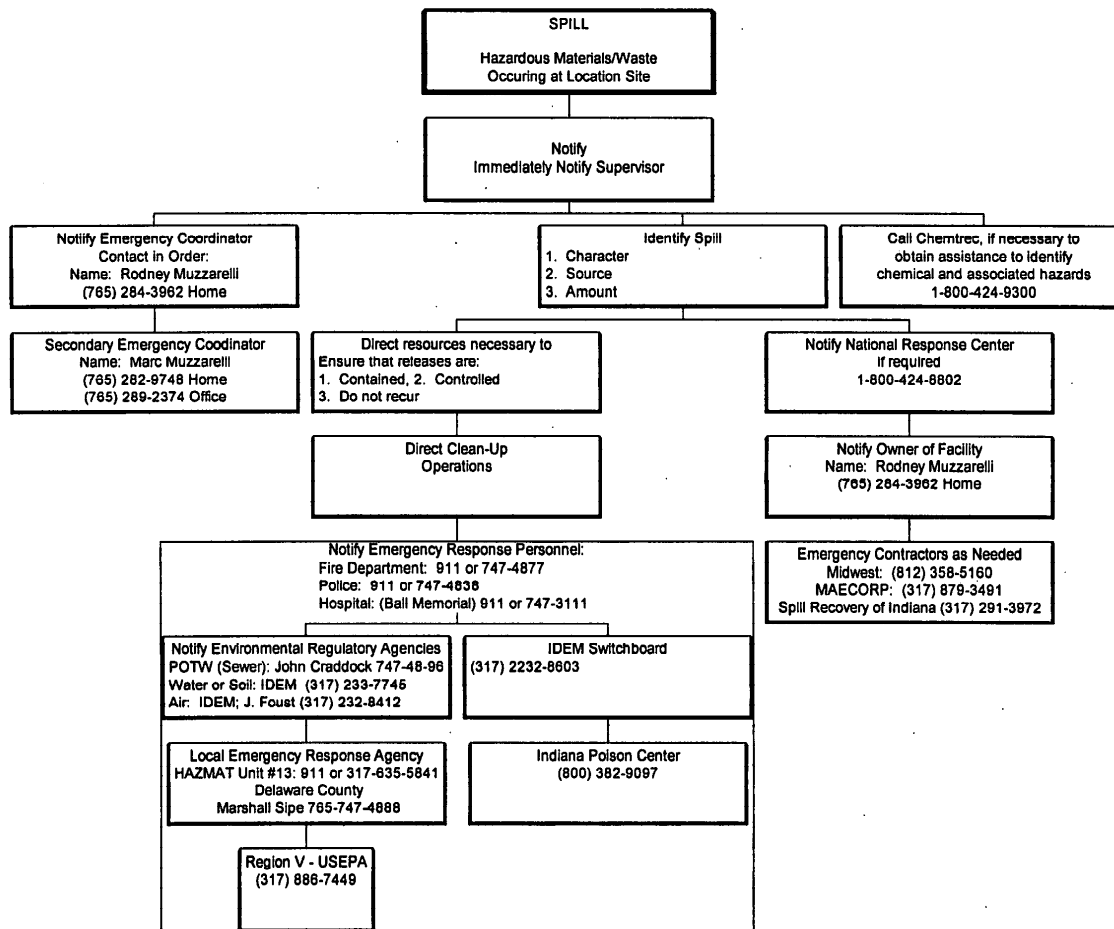
MID-CITY PLATING CO., INC.

Evacuation Plan

Hackley Street



REVISED: 7/3/97



MID CITY PLATING CO., INC.

MUNCIE, IN

HAZARDOUS WASTE MANAGEMENT PROCEDURES

JOB DESCRIPTIONS/PERSONNEL TRAINING

- A. GENERAL:** This document is designed to comply with the requirements outlined in Hazardous Waste Operations and Emergency Response and 29 CFR, Part 1910 Subpart H - Hazardous Materials, (q), Emergency Response to Hazardous Substance Releases.

B. JOB DESCRIPTIONS:

The following paragraphs summarize the responsibilities of supervisors and employees covered under this regulation.

PLANT MANAGER: Has overall facility responsibility. Must be familiar with all aspects of waste treatment, treatment and storage vessels and tanks, functions of essential waste treatment equipment, disposal of hazardous materials and contingency procedures as outlined in this document.

WASTEWATER TREATMENT OPERATOR: Has overall responsibility for the safe and expedient handling of wastes, including wastewater treatment effluent discharges and sludges. Responsible directly to Plant Manager. Must be knowledgeable of both federal and state EPA laws and regulations and maintain coordination with federal and state EPA agencies and other

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

interested government agencies with respect to waste treatment, water pollution abatement and other matters of environmental and ecological concern. Responsible for all training of personnel related to hazardous chemical/material handling, treatment and storage. Responsible directly to the Plant Manager during emergency hazardous waste responses and actions.

MAINTENANCE SUPERVISOR: Must be familiar with all equipment relating to waste treatment. Must be familiar with the contingency procedures as outlined in this document. Will provide assistance, as necessary, to assure the proper disposition of waste materials. Will coordinate emergency responses with the waste treatment operator.

PRODUCTION MANAGER: Responsible for maintaining thorough proficiency and knowledge of all aspects of waste treatment. Must be knowledgeable concerning waste treatment equipment and processes. Directly responsible to the Plant Manager.

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

LIST OF PERSONNEL

Position

Plant Manager	Rodney Muzzarelli
Maintenance Supervisor	Ron Jennings
Plating Supervisor	Gary Blankenship
Wastewater Treatment Operator	Neil Jeffries
Production Manager	Marc Muzzarelli

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

- C. **PURPOSE:** The following outline establishes an initial training program for newly hired personnel whose position relates to hazardous waste management.

SECTION A

OUTLINE OF INITIAL TRAINING PROGRAM

Initial training will be provided by a fully proficient operator and monitored by the Plating supervisor.

I. **Waste Treatment Facilities and Equipment**

1. General Layout (Appendix I)
 - a) Effluent point to POTW
 - b) Cyanide holding tank
 - c) Non-cyanide holding tank
 - d) Equalization tank
 - e) Cyanide oxidation tanks
 - f) Lift station
 - g) Final pH adjust
 - h) Sludge thickness
 - i) Filter press
 - j) Sludge dryer
 - k) Sand filtration unit
 - l) Deionized water system

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

2. Waste Treatment Testing

- a) Use of pH meter
- b) Use of pipette
- c) Use of burette
- d) Use of spectrophotometer
- e) Use of hood, Bunsen burners, flasks, etc.
- f) Conducting actual tests under supervision
 - (1) Cyanide before treatment
 - (2) Cyanide after treatment
 - (3) Hexavalent chrome conversion to trivalent chrome
 - (4) pH
 - (5) Other tests as directed

3. Daily / Weekly / Monthly / Yearly WWT Duties

- a) Cleaning probes
- b) Chemical makeups
- c) Calibrating probes/analytical equipment
- d) Servicing of flow meters
- e) Tank/pit/ditch cleaning

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

4. Flume

- a) Effluent checks
- b) Flow meter
- c) Sampling for in-house analysis
- d) Sampling for outside laboratory analysis

5. Sludge Dryer/Filter Press Operation and Sludge Management

- a) Filter press operation
- b) Sludge pumps
- c) House-keeping
- d) Sludge dryer operation

6. Plating Processes

- a) Familiarization (including drainage system)
- b) Tests
- c) Adds

II. Additional Waste Streams Training

- 1. Drum handling procedures
 - a) Manifesting

- b) Proper drum labeling

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HAZARDOUS WASTE MANAGEMENT PROCEDURES

- a) Proper waste still bottoms handling and storage procedures

III. Emergency Response Training

1. Equipment use
2. Communication system
3. Review of emergency procedures and contingency plan

D. CONTINUING TRAINING: As continuing training for hazardous waste management personnel, an annual review of the Hazardous Materials in the Workplace Training Program and Hazardous Waste Management Procedures and any modifications/revisions made to the procedures during the year, will be performed.

1. Type and Amount of Training

<u>Position</u>	<u>Training Outline sections</u>
Plant Manager	All
Maintenance Supervisor	All
Plating Supervisor	All
Waste Treatment Operator	I and II

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